

STATE OF INDIANA  
INDIANA UTILITY REGULATORY COMMISSION

FILED

FEB 05 2002

In the Matter of the Petition of Indiana Bell )  
Telephone Company, Incorporated d/b/a )  
Ameritech Indiana, Pursuant to I.C. 8-1-2-61, )  
for a Three-Phase Process for Commission )  
Review of Various Submissions of Ameritech )  
Indiana to Show Compliance with Section 271(c) )  
of the Telecommunications Act of 1996 )

INDIANA UTILITY REGULATORY COMMISSION

Cause No. 41657

**AT&T's Response to Ameritech Indiana's Quarterly  
Flow-Through Status Reports**

AT&T Communications of Indiana, GP and TCG Indianapolis hereby file this response to Ameritech's September and December 2001 *Quarterly Flow-Through Status Reports*.

**I. Background**

After consummation of the SBC/Ameritech merger in October of 2000, and in fulfillment of certain Ameritech commitments (made to induce state commission approval of that merger), Ameritech entered into collaboratives with the competitive local exchange carriers ("CLECs") operating in the Ameritech region. In those collaboratives the parties discussed numerous competitive issues, including those associated with the planned post-merger upgrade of Ameritech's Operational Support Systems ("OSS"). Throughout those collaboratives, the CLECs stressed that any plan for OSS enhancement must include a detailed plan for increased mechanized flow of CLEC orders through Ameritech's systems.

After many months of collaboration, the parties eventually came to agreement on most of the outstanding OSS issues and put that agreement to writing. That written

agreement was eventually jointly filed on December 27, 2000 with the Commission as a Joint Report ("*Joint Report*"). In regard to flow through, the agreement provided as follows:

1. *Ameritech will provide CLECs with a complete flow through listing, with complete exceptions, on or before April 15, 2001.*
2. *In April 2001, CLECs will provide Ameritech with a prioritized list identifying products/order types that CLECs seek to have flowed through over the next 24 months. The prioritized list will reflect those products or order types that CLECs currently provide or anticipate providing in significant volumes. The CLEC list will include Centrex resale. Also in April 2001, CLECs and Ameritech will assign a target percentage of flow through exceptions that will be eliminated quarterly over the next 24 months for each prioritized product/order type. If agreement on such a target cannot be achieved, CLECs may utilize the formal dispute resolution process agreed to by the parties in this case.*
3. *Ameritech shall make a good-faith effort to attain significant improvements over the next 24 months in the flow through rate for the order/product types identified in the CLEC list provided under paragraph 1. Ameritech will set a percentage target for each order/product type that it believes represents a significant improvement for those order/product types.*
4. *By May 2001, Ameritech will provide a detailed project plan outlining the milestones it will report, on a quarterly basis, to reflect progress in meetings for improving flow through.*
5. *The project plan, along with the CLECs' prioritized list, will be presented to the Commission for monitoring.*
6. *Quarterly, beginning on September 10, 2001, Ameritech will report providing details about how its efforts are progressing. These reports shall be filed with the Commission and served on all parties in this proceeding. Ameritech's quarterly reports will be subject to Commission review. CLECs will have the opportunity to comment on the quarterly reports.*
7. *If CLECs believe that significant progress has not been made, they may petition the Commission to request a determination and to request penalties and other specific remedies, which may include payments to CLECs.*

8. *Ameritech's flow through will be included within the scope of the third-party test.*

The CLECs and Ameritech have conducted most the activities associated with paragraphs 1-5 (except as noted below). However, Ameritech subsequently failed, allegedly due to oversight, to provide the September 10, 2001 quarterly flow through report. Instead, in December of 2001 Ameritech filed both its September 2001 and December 2001 quarterly reports. By this pleading, AT&T provides comment on Ameritech's reports, as contemplated by the flow-through settlement.

## **II. Comments**

### **(1) Ameritech's Reports Provide Inaccurate Information Concerning CLEC Input On Additional Flow Through Initiatives.**

Ameritech's December 2001 Progress Report misrepresents and discounts CLEC feedback concerning Ameritech's proposed flow through initiatives. Ameritech paints a picture of a passive CLEC community failing to provide Ameritech prioritization and input for additional flow through initiatives. In reality, however, CLECs, including AT&T, have continually stressed the need for additional flow through initiatives for certain UNE-P order-types. AT&T believes the Commission should be aware of this CLEC priority as it continues to assess Ameritech's adherence to its commitment to "significantly" improve flow through.

For example, Ameritech's December 2001 Report accurately states that in the August 2001 Change Management meeting, Ameritech committed to add five additional flow through initiatives to its June 2002 release. The December 2001 Progress Report further provides, again accurately, that in the August 2001 Change Management Meeting

the CLECs requested four additional flow through initiatives to be added to the June 2002 release:

- (1) UNE-P Suspend & Restore
- (2) UNE-P New Installs in Indiana
- (3) UNE-P Record
- (4) UNE-P Outside Move.

Ameritech then claims that, despite its request that CLECs “give these projects their priority in the event that additional bandwidth becomes available,” “no additional input” was received by the CLECs on the four additional initiatives.

This assertion is simply erroneous. The CLECs have prioritized these items and have given Ameritech considerable input concerning their desire to see these items be added to Ameritech’s flow through initiatives. First of all, an August 10, 2001 Ameritech accessible letter clearly acknowledges that at least four CLECs provided Ameritech their “priorities” between these four proposed flow-through initiatives and the five new initiatives already planned by Ameritech. (That Accessible Letter is attached hereto as Attachment 1.)

In addition, in its September 2001 CMP, Ameritech introduced the document captioned “October Flow Through Prioritization” list (attached to Ameritech’s December Report as Attachment B). In that document, Ameritech itself acknowledges that CLECs identified the above-listed four initiatives “for prioritization” in the June 2002 release. The document proceeds to detail a list of the six flow through initiatives requested by the

CLECs --four of which are the same as those identified above.<sup>1</sup> And for each of those four Ameritech admits that CLECs have ticketed those items as high priority:

- For UNE-P Outside Move, Ameritech states that “this category was requested [by the CLECs] as a high priority for the June release, but not included for implementation.” December 2001 Flow Through Report, Attachment B.
- For UNE-P New Installs, Ameritech admits that “[t]his was another request for the June release that will not be included. Although written feedback was only received from one CLEC for the June release, verbal feedback was very high.” *Id.*
- For UNE-P Record, Ameritech acknowledged that “[t]his category was requested as a high priority for the June release, but not included for implementation.” *Id.*
- For UNE-P Suspend and Restore, Ameritech again admits that “[t]his activity was a priority received [by the CLECs] for the June release, but Ameritech was unable to include it on the schedule.” *Id.*

Far from documenting a passive CLEC community failing to give input to Ameritech, this Ameritech-produced document demonstrates that the CLEC community has been actively giving Ameritech feedback concerning these proposed flow through initiatives.

In addition, Ameritech’s December Report asserts that “no responses were received” to the October Flow Through Prioritization, and further states that in the November 2001 CMP flow through discussion “[n]o additional input for the October

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<sup>1</sup> The October Flow Through Prioritization document is this self-contradictory. While it first claims that no CLEC requests were received, it then goes on to list the six candidates for additional flow through initiatives -- all of which were requested by the CLECs.

release was received.” That, again, is simply wrong. Indeed, in a November 2001 Change Management Meeting, AT&T and other carriers again discussed their prioritization of the proposed initiatives identified in that document. Attending that meeting by phone, AT&T’s representative provided AT&T’s specific priority ranking of these items as follows: (1) UNE-P new installs in Indiana, (2) UNE-P Suspend/Restore, (3) UNE-P Record, (4) UNE-P Outside Move. In addition, other CLECs, including WorldCom, provided their priorities for UNE-P flow through initiatives. Several other carriers discussed their desire for UNE-P coin, while most CLECs placed UNE-P coin at the bottom of their priority list.

In sum, Ameritech’s consistent claim that “no additional input was received” cannot be squared with the facts, and it leaves a misleading impression. The CLEC community, including AT&T, has consistently given Ameritech significant feedback and input concerning its proposed flow through initiatives.

**(2) Ameritech’s Reports Provide Insufficient Information Concerning Progress in Reaching Targeted Goals for Improving Flow Through.**

While Ameritech’s flow through progress reports provide good and useful information concerning how Ameritech plans to improve flow through, and when it plans to do so, it fails to provide the “targets” that Ameritech is obligated to set pursuant to the terms of the Settlement. These targets are essential if the CLECs and the Commission are to gauge Ameritech’s progress in improving flow through.

For example, the settlement provides that “in April 2001” Ameritech must work with the CLECs to “assign a target percentage of flow through exceptions that will be eliminated quarterly over the next 24 months for each prioritized product/order type.” Ameritech has not listed these targets in its progress reports, nor has it engaged the CLEC

community to discuss them. The Commission and its staff should direct Ameritech to work with the CLEC community and amend its progress reports to include these targets.

In a similar vein, the settlement requires that Ameritech “attain significant improvements” in flow through rates for order/product types identified by the CLECs. In order to make Ameritech draw some line in the sand, the settlement further provides that: “Ameritech will set a percentage target for each order/product type that it believes represents a significant improvement for those order/product types.” *Id.* Again, Ameritech has failed to do so as of yet.<sup>2</sup> But it is essential for Ameritech to do so now so that all parties know the target Ameritech is working toward and, as time passes, determine how Ameritech is progressing in meeting that target. It would provide no incentive for Ameritech to set this target after it completes its flow through initiatives. Again, the Commission and its staff should order Ameritech to amend its progress report to include these targets.

Finally, AT&T notes one last concern, which relates more to future quarterly reports. Ameritech has committed to disaggregating its total flow-through performance measure (13.1) to allow CLECs to review the flow-through percentages for the product/order types identified by the CLECs in the prioritized list referenced above. In addition, Ameritech has committed to providing the disaggregated performance results in the quarterly reports. As Ameritech executes its flow through initiatives, it is imperative that its quarterly flow through reports contain this disaggregation. Otherwise, neither the Commission nor the CLECs will be able to determine whether Ameritech’s flow through rates for these product/order types are actually improving.

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<sup>2</sup> Ameritech’s progress reports (and its May 2001 Flow Through Plan) only provide the current flow through percentages for the product/order types slated for improvement. It fails to disclose Ameritech’s target flow through percentage for these items. The Settlement demands that Ameritech do just that.

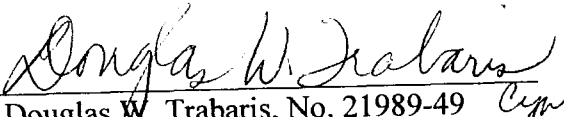
## CONCLUSION

For the reasons discussed above, AT&T requests that the Commission and its staff direct Ameritech to revise and/or amend its quarterly flow-through reports as described above. These revisions will assure that the Commission and the CLECs have the information necessary for them to track Ameritech's improvement in flow through over the next year.

Respectfully submitted,

AT&T COMMUNICATIONS OF INDIANA, GP

TCG INDIANAPOLIS

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served on the following counsel of record via first class United States Mail, postage paid, this 4<sup>th</sup> day of February, 2002.

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Date: **August 10, 2001**

Number: **CLECAMS01-103**

Effective Date: **NA**

Category: **OSS**

Subject: **AMERITECH - 24-Month Flow-Through Implementation Plan**

Related Letters: **NA**

States Impacted: **Ameritech Region**

Response Deadline: **August 15, 2001**

Contact: **Account Manager or the Change Management mailbox at**  
[sbccmp@msq.pacbell.com](mailto:sbccmp@msq.pacbell.com)

Conference Call/Meeting: **NA**

This Accessible Letter serves to provide notification that Ameritech has received the following requests for Flow-Through prioritization for the June 2002 release.

## **CLEC June 2002 Prioritization Request**

<b>Flow Through Description</b>	<b>Number of CLECs</b>
Resale Centrex	1
Retail customer accounts with contracts including special pricing plans like call packs.	1
UNE-P to UNE-P Migrations	1
Supps for DD Change and Cancel	3
UNE Loops Up to 20	1
UNE-P Suspend & Restore	1
UNE-P New Installs in Michigan	1
UNE-P Record	1
UNE-P Outside Move	1

Responses were received from four CLECs. If CLECs wish to provide additional input, please submit requests to the CMP mailbox at [sbccmp@msq.pacbell.com](mailto:sbccmp@msq.pacbell.com) by Wednesday, August 15, 2001.

Discussion surrounding the prioritization of these requests will be held during the August Change Management meeting.

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